

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**
(Greenbelt Division)

IN RE:

TRACEY L. JORDAN

Debtor

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Case No. 19-21351 LSS

Chapter 13

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RESPONSE TO OBJECTION TO CONFIRMATION

COMES NOW the Debtors, Tracey L. Jordan, by and through undersigned Legal Counsel, hereby responses to the objection to confirmation filed by NewRez LLC D/B/A Shellpoint Mortgage Servicing as Servicer for Deutsche Bank National Trust Company, as Trustee for Soundview Home Loan Trust 2007-WMCI, asset backed certificates, Series 2007-WMCI. In support thereof, the Debtor states the following:

1. On August 23, 2019 (the "Petition Date"), the Debtors filed their respective voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code (the "Bankruptcy Code"), thereby initiating its Bankruptcy Case.
2. The Meeting of the Creditors and Notice of Appointment of the Trustee, Nancy Spencer Grigsby, was issued on August 24, 2019.
3. On September 5, 2019 at Dkt. 20, the secured creditor filed an Objection to Confirmation stating that the Debtor's Plan does not provide for full payments of the arrearages, however, the secured creditor has failed to file a Proof of Claim with an itemization of how they have arrived at their numbers.

WHEREFORE, the Debtors, Tracy L. Jordan, responds to the objection to confirmation as filed by the secured creditor, NewRez LLC D/B/A Shellpoint Mortgage Servicing as

Servicer for Deutsche Bank National Trust Company, as Trustee for Soundview Home Loan Trust 2007-WMCI, asset backed certificates, Series 2007-WMCI and for relief that may be of benefit to the Debtors, including, a Proof of Claim that supports their contention.

DATE: September 16, 2019

/s/ Arlene A. Smith-Scott
Arlene A. Smith-Scott, Esquire
Counsel for Debtor #18374
Strategic Law Group, LLC
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CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 3rd day of September 2019, a copy of the foregoing Response to Objection to Confirmation was served pursuant to Federal Bankruptcy Rule 7004(h) by certified mail, or electronically as indicated:

CMECF:

Katherine Loverde
Alba Law Group, P. A.
11350 McCormick Road
Executive Plaza 1, Suite 302
Hunt Valley, MD 21031

Nancy Spencer Grigsby
185 Admiral Cochrane Drive
Suite 240
Annapolis, Maryland 21401

FIRST CLASS MAIL:

Tracey L. Jordan
1806 Ironton Drive
Oxon Hill, MD 20745

Djouweratou Abi
4313 Saddle River Drive
Bowie, Maryland 20720

DATE: September 16, 2019

/s/ Arlene A. Smith-Scott
Arlene A. Smith-Scott, Esquire